



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
ENVIRONMENTAL FIELD OFFICE
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September 23, 2015

CERTIFIED MAIL
7014 1200 0001 0636 5901
9590 9401 0014 5168 6659

Mr. Chase Hively
Ready Mix USA, LLC
P.O. Box 2389
Knoxville, TN 37901

Re: **Notice of Violation (NOV)**
Ready Mix USA, LLC - Jersey Pike
NPDES Permit Tracking Number: TNG 110331
2 Pelican Drive
Hamilton County, Tennessee

Dear Mr. Hively:

On August 18, 2015, Jennifer Dulin and Jessica Rader of the Division of Water Resources (DWR) conducted a Compliance Evaluation Inspection (CEI) of the above referenced facility. They met with plant manager, Michael Johnston who provided information during their inspection. The purpose of the inspection was to evaluate Ready Mix USA, LLC – Jersey Pike's compliance with the terms and conditions of your National Pollution Discharge Elimination System (NPDES) permit, NPDES Permit Tracking Number TNG110331.

Permit Verification

Ready Mix USA, LLC - Jersey Pike has coverage under the Tennessee General Permit for Ready Mixed Concrete facilities (RMCP) - NPDES Permit Number TNG110000 which became effective on January 10, 2013, and will expire on October 31, 2017. This permit authorizes owners/operators of ready mixed concrete plants (RMCP) to discharge various process wastewaters into waters of the State; to discharge storm water run-off from plant property into waters of the States; and to operate recycle/reclaim systems. The NPDES Permit allows Ready Mix USA LLC to operate Outfall 001 as a non-discharging outfall; sampling required if discharge occurs. The facility is also authorized to discharge its stormwater from Outfall SW1 to the following receiving waters: Friar Branch. A copy of the Notice of Coverage (NOC) was available on site.

Records and Reports/SWPPP

Ms. Dulin and Ms. Rader reviewed the Stormwater Pollution Prevention Plan (SWPPP) during the inspection. Your permit requires that certain documents be onsite and available for review. The following information was not available at the time of inspection: a copy Notice of Intent (NOI); a facility site map; documentation of monthly inspections of outdoor areas; comprehensive site inspection for 2012, 2013, and 2014; documentation of employee training for 2012, 2013, and 2014.

During the inspection, a copy of the facility site map was faxed to the plant manager, Michael Johnston. In a review of the SWPPP, inspectors observed that the Pollution Prevention Team was out of date and the facility site map lacked key information. Specifically, the facility site map must contain: directional arrows indicating stormwater flow across the site; location of outfalls; name of receiving waters (if not on map need directional arrow indicating location). DWR has enclosed an example of an approved site map.

Facility Site Review

Ready Mix USA, LLC's (Ready Mix USA) is a Ready-Mixed Concrete Plant, SIC code 3273, located in Hamilton County. The plant consists of a main office, parking area for trucks, ready mix plant and storage bins for aggregate. Discharge from the site consists of all storm water runoff from approximately 3 acres.

The main office, cement silos, and a storage tank are located on the north end of the property. The inspectors observed a truck parking area near the entrance and a truck washout station at the center of the facility (Figure 1). Truck washout water is contained in a series of settling basins and is used as process make-up water. The inspectors also observed aggregate stored in bins at the south and southeast (Figure 2). Excess concrete and block are located along the northeast perimeter. Martin Marietta, a gravel pit, created a berm of rock and debris from their mining operations along the Ready Mix USA's south property line.

Effluent/Receiving Stream

The permitted Outfall SW1 was visually inspected during the inspection. Outfall SW1 is located at the northeast side of the facility. Ms. Dulin and Ms. Rader observed pollutants in Outfall SW1's discharge (Figures 3 and 4).

Self-Monitoring Program

Ready Mix USA provided the following documentation via email after the inspection: monthly site inspections for 2013, 2014, and 2015; comprehensive site inspections for 2012, 2013, and 2014; employee training for 2013 and 2014.

Operation and Maintenance

The permit requires that BMPS be installed and good housekeeping practices be practiced in order to prevent cement dust, aggregate and other materials from being discharged into Waters of the State.

Pollution Prevention

Structural controls are inadequate. Inspectors observed pollutants from the facility in the Outfall's discharge (Figures 3 and 4).

Violations:

- Facility site map lacked key information: directional arrows indicating stormwater flow across the site; location of outfalls; name of receiving waters (if not on map need directional arrow indicating location).
- Inadequate structural controls.

Required Actions:

- Ready Mix USA L.L.C. must provide copies of available documentation required by the permit i.e., employee training, and etc. to DWR before October 30, 2015.
- Update the facility site map and submit a copy to DWR before October 30, 2015.
- Before October 30, 2015, Ready Mix USA L.L.C. must remove the pile of aggregate from Outfall SW1 and apply structural controls to capture pollutants before they reach the outfall.

This letter provides a record of the August 18, 2015 Compliance Evaluation Inspection.

The Division would like to thank Mr. Johnston for his time and assistance during our inspection. If you have any questions concerning either our inspection or this report, please contact Ms. Dulin at (423) 634-5715.

Sincerely,



Jennifer Innes

Program Manager

Division of Water Resources

Chattanooga Environmental Field Office

cc: Mounir Minkara, Ph.D., Water Quality Manager, City of Chattanooga via email

enc: site map guidance

Figure 1.
Truck Parking Area
and Washout
Station.



Figure 2.
Settling Basins and
Open Aggregate
Piles.



Figure 3.

Concrete sediments
in Stormwater
Outfall SW1

Note: gray color of
stormwater run-off.



Figure 4.

Concrete sediments
in Stormwater
Outfall SW1. Note:
Gray color of
stormwater run-off.

